

Document Log Item

Addressing	
From	To
Christine Katin/R9/USEPA/US	"Whitcomb, James H CIV NAVFAC SW" <james.h.whitcomb@navy.mil> "Whitcomb, James H CIV NAVFAC SW" <james.h.whitcomb@navy.mil>
CC	BCC
charles.l.perry@navy.mil james.b.sullivan2@navy.mil	
Description Form Used: Reply	
Subject	Date/Time
RE: Site 12 screening strategy	09/14/2009 02:29 PM
# of Attachments	Total Bytes
0	8,700
NPM	Contributor
Processing	
Comments	

Body

Document Body

Hi Jim-

Robert is out this week but I will confirm the intent of his comment (i.e., whether he was referring to the proposed screening criterion or the future closeout criterion) and get back to the Navy next week.

Christine Katin
U.S. EPA, Region 9
San Francisco, CA
(415) 972-3112

"Whitcomb, James H CIV NAVFAC SW" ---09/14/2009 01:30:00 PM---Hello Christine- We are providing a response for the EPA comments Dated September 09, 2009 "Attached

From: "Whitcomb, James H CIV NAVFAC SW" <james.h.whitcomb@navy.mil>
To: Christine Katin/R9/USEPA/US@EPA
Cc: "Perry, Charles L CIV NAVFAC SW, BRAC" <charles.l.perry@navy.mil>, "Sullivan, James B CIV OASN (I&E) BRAC PMO West" <james.b.sullivan2@navy.mil>, <rsunga@dtsc.ca.gov>, "Jue, Tracy (CDPH-DDWEM)" <Tracy.Jue@cdph.ca.gov>, Robert Terry/R9/USEPA/US@EPA, <rsteenson@waterboards.ca.gov>, <Gary.Foote@amec.com>, "Hamm, John" <John.Hamm@shawgrp.com>, "Owens, Patrick A CIV SEA 04 04N" <patrick.a.owens@navy.mil>
Date: 09/14/2009 01:30 PM
Subject: RE: Site 12 screening strategy

Hello Christine-

We are providing a response for the EPA comments Dated September 09, 2009 "Attached Below". The EPA comments regarding the 25 mrem/yr screening dose rate and the USNRC decommissioning rule, 10 CFR 20.1401-1406 are appropriate for unconditional release (Final Status Survey). However, at this point we are proposing a scoping survey to determine if there is an immediate human health risk. We have concluded that the proposed screening standard of 10 microR/hr based on the regulatory limit of 100 millirem per year for members of the public is more applicable for this scoping survey. The scoping survey is only intended to assess immediate human health risk, based on a very conservative occupancy of 24 hours/day, 365 days/year.

Please let me know if you concur with our response or if you would like to setup a meeting for more clarification on our goals for this data.

V/r

Jim Whitcomb

James Whitcomb, P.G., RPM
BRAC Treasure Island Team
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BRAC PMO West
1455 Frazee Road Suite 900
San Diego, Ca 92108-4310

-----Original Message-----

From: Katin.Christine@epamail.epa.gov
[mailto:Katin.Christine@epamail.epa.gov]
Sent: Wednesday, September 09, 2009 16:30
To: Whitcomb, James H CIV NAVFAC SW; Whitcomb, James H CIV NAVFAC SW;
Whitcomb, James H CIV NAVFAC SW
Cc: Perry, Charles L CIV NAVFAC SW, BRAC; Sullivan, James
B CIV OASN (I&E) BRAC PMO West; Remedios Sunga; Tracy Jue;
Terry.Robert@epamail.epa.gov; Ross Steenson; Gary.Foote@amec.com
Subject: Site 12 screening strategy

Hello Jim-

I consulted with Robert Terry (EPA's Radiation Health Physicist) about the dose rate survey of selected backyards on North Point and Bay Side, which the Navy presented to the BCT at the September 2 meeting. In response to BCT questions at the meeting, the Navy agreed to provide more information on the process that was used to select the buildings for the survey. I will therefore not comment on the selection of buildings at this time. With respect to the survey proposal, please consider the following:

Please express the results of the survey in terms of the contribution of the ambient radiation dose from residual contamination above

background. We would expect that measurements taken using a Ludlum Model 19 will satisfactorily demonstrate that the contribution is zero or very close to zero.

In converting the hourly gamma radiation exposure rate to an annual dose rate, the Navy/contractors should present an occupancy factor that is based on realistic assumptions about (a) future property use scenario(s).

Although significant differences are not anticipated, measurements above grass are preferred over concrete slabs if the concrete slabs will be removed in the future. If measurements are taken above concrete, EPA recommends treating the data as two separate data sets, at least initially.

Regarding the stated screening/closeout criterion of 100 millirem per year for members of the public, we expect that the Navy would use the current USNRC decommissioning rule, 10 CFR 20.1401-1406.

Please call/email with any questions. Robert Terry is out of the office this and next week, but I should be able to follow up with him once he returns to the office.

-Christine

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